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Counsel to the Thrasio Legacy Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

1 THRASIO ONE, INC.,

Reorganized Debtor.¹

Chapter 11

Case No. 24-11850 (CMG)

(Jointly Administered)

META ADVISORS, LLC, solely in its capacity as Trustee of the Thrasio Legacy Trust,

Adv. Pro. No. 24-01637

Plaintiff,

v.

JOSHUA SILBERSTEIN; CARLOS CASHMAN; DANIEL BOOCKVAR; JOSEPH FALCAO; MOUNIR OUHADI; ADITYA RATHOD; ARI HOROWITZ; EVERYTHING'S COMING UP MILLHOUSE, LLC; CASHMAN FAMILY INVESTMENT II, LLC; HUDSON PALM LLC; and YARDLINE CAPITAL CORP.,

Defendants.

¹ The last four digits of Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

APPLICATION FOR PRO HAC VICE ADMISSION OF THERESA A. FOUDY

James S. Carr, a member in good standing of the bars of New Jersey and New York (the “Movant”), pursuant to L. Civ. Rule 101.1(c) and D.N.J. LBR 9010-1, respectfully moves this Court, on behalf of attorney Theresa A. Foudy, for an order granting permission for Ms. Foudy to appear *pro hac vice* on behalf of the Thrasio Legacy Trust (the “Trust”) and plaintiff META ADVISORS, LLC, solely in its capacity as Trustee of the Thrasio Legacy Trust, in the above-captioned adversary proceeding. In support of this request, Movant represents as follows:

1. I am a partner of the law firm of Kelley Drye & Warren LLP, which maintains an office at One Jefferson Road, 2nd Floor, Parsippany, New Jersey 07054. I am admitted to practice in the state of New Jersey and before the United States District Court for the District of New Jersey, and I am familiar with the Local Rules of practice of this Court. There are no disciplinary proceedings which are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

2. As set forth in the certification of Theresa A. Foudy annexed hereto, Ms. Foudy is a partner in the bankruptcy department at the law firm of Morrison & Foerster LLP. Upon information and belief, Ms. Foudy is a member in good standing of the bar of the State of New York. No disciplinary proceedings are pending against her nor has any discipline been imposed on her in any jurisdiction.

3. If admitted *pro hac vice*, Ms. Foudy has represented that she will adhere to the disciplinary jurisdiction of this Court.

4. I have appeared as counsel of record for the Trust and plaintiff META ADVISORS, LLC, solely in its capacity as Trustee of the Thrasio Legacy Trust, in the above-captioned adversary proceeding and shall serve as local counsel upon whom all notices, orders, and pleadings shall be served.

WHEREFORE, Movant respectfully requests entry of the Order submitted herewith granting admission *pro hac vice* of Theresa A. Foudy to represent the Trust in connection with the above-captioned adversary proceeding.

Dated: December 6, 2024

KELLEY DRYE & WARREN LLP

By: /s/ James S. Carr

James S. Carr, Esq.
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Defendants.

**CERTIFICATION OF THERESA A. FOUDY IN SUPPORT
OF APPLICATION FOR ADMISSION PRO HAC VICE**

I, Theresa A. Foudy, pursuant to 28 U.S.C. § 1746, hereby certify:

1. I am an attorney with the law firm of Morrison & Foerster LLP, which maintains an office at 250 West 55th Street, New York, New York 10019-9601.

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2. I am, and have always been, a member in good standing of the bar of the State of New York (1994). No disciplinary proceedings are pending against me in any jurisdiction and no discipline has been imposed on me in any jurisdiction.

3. Upon being admitted to appear and participate in these cases *pro hac vice*, I shall promptly cause payment to be made to the Clerk of Court in the amount of \$250.00 pursuant to Rule 101.1(c)(3) of the Local Civil Rules of the United States District Court for the District of New Jersey.

4. James S. Carr, a partner of the law firm of Kelley Drye & Warren LLP, has appeared as counsel of record for the Thrasio Legacy Trust and plaintiff META ADVISORS, LLC, solely in its capacity as Trustee of the Thrasio Legacy Trust, in the above-captioned adversary proceeding and shall be local counsel upon whom all notices, orders, and pleadings shall be served.

5. I am in possession of and have reviewed a copy of the Local Bankruptcy Rules of this Court.

6. I understand and agree that, if admitted *pro hac vice*, I will be bound by the rules of this Court, including all applicable disciplinary rules, and that I will notify this Court immediately of any matter affecting my good standing before the bar of any jurisdiction.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: December 6, 2024

/s/ Theresa A. Foudy
Theresa A. Foudy

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Debtor: 1 THRASIO ONE, INC.

Case No.: 24-01637 (CMG)

Caption of Order: ORDER FOR ADMISSION PRO HAC VICE

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The relief set forth on the following pages, numbered three (3) through and including four (4), is hereby ORDERED.

(Page 3)

Debtor: 1 THRASIO ONE, INC.

Case No.: 24-01637 (CMG)

Caption of Order: ORDER FOR ADMISSION PRO HAC VICE

This matter having been brought before the Court on application for an Order for Admission *Pro Hac Vice*; and the Court having reviewed the moving papers of the applicant, an out-of-state attorney, and considered this matter pursuant to Fed. R. Civ. Proc. 78, D.N.J. L. Civ. R. 101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Theresa A. Foudy be permitted to appear *pro hac vice*; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

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Debtor: 1 THRASIO ONE, INC.

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United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further

ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within five (5) days of its date of entry.